

# Ex. I

**In the Matter Of:**

**HOLCOMBE vs UNITED STATES of AMERICA**

5:18-cv-00555-XR

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**EMILY WILLIS**

*May 26, 2020*

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EMILY WILLIS  
HOLCOMBE vs UNITED STATES of AMERICA

May 26, 2020

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1 UNITED STATES DISTRICT COURT  
2 FOR THE WESTERN DISTRICT OF TEXAS

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4 JOE HOLCOMBE, et al.,  
5 Plaintiff,

6 vs. Civil Action No:  
5:18-cv-00555-XR

7 UNITED STATES OF AMERICA,  
8 Defendant.

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12 REMOTE VIDEOTAPED DEPOSITION OF

13 EMILY WILLIS

14

15 May 26, 2020

16 10:00 a.m.

17

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19 Remote Videotaped Proceedings  
20 Colorado Springs, Colorado

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Cynthia Gage, B.S., M.A., California CSR No. 10492  
Notary Public in and for the State of Colorado

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1 anger problems that in my opinion he had, I think at  
2 that time I definitely could have seen him lashing  
3 out in that sense.

4 BY MS. KRIEGER:

5 Q Were you surprised when you heard about the 11:54:09  
6 shooting at the church in Texas?

7 A Yes.

8 Q Why were you surprised?

9 A Um, I guess that not just a daily thing that  
10 happens. So there's obviously like that initial 11:54:27  
11 shock. But I guess the more that I thought about it,  
12 I guess it made sense that it was him.

13 Q Do you believe that if Devin had asked  
14 Danielle to purchase a weapon for him, how do you  
15 think she would have responded? 11:54:56

16 MR. SCHREIBER: Calls for speculation.  
17 Objection.

18 THE WITNESS: Um, in my opinion, when Devin  
19 wanted something from Danielle, she would do whatever  
20 it took to make him happy. I don't particularly 11:55:13  
21 think that if she would have known what was going to  
22 happen with the firearm she would have done it. But  
23 if it was like an everyday type of question, I guess  
24 I could see her doing it. Buying the gun. I'm  
25 sorry. 11:55:36

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1 BY MS. KRIEGER:

2 Q So just to be clear if Devin had asked  
3 Danielle to purchase a weapon, do you think that  
4 Danielle would have purchased it for him?

5 MR. SCHREIBER: Objection. Calls for  
6 speculation.

11:55:46

7 THE WITNESS: Um, yes. Um, just to add on  
8 to that, in my opinion if she knew what it was going  
9 to be used for, I don't think she would have. But  
10 yes.

11:55:59

11 BY MS. KRIEGER:

12 Q While you were living with the Kelleys, how  
13 did Devin treat you?

14 A Um, kind of just like another person living  
15 there. I think he saw that I was not someone that  
16 can be manipulated, so I don't think that he tried.  
17 I think he just kind of let me live there, um, if  
18 that makes sense, Um, kind of like as a passing by  
19 person, if that makes sense.

11:56:17

20 MR. SCHREIBER: Can you repeat that? Mine  
21 cut out.

11:56:40

22 THE WITNESS: Yes, sir.

23 He just treated me as if I was like a  
24 passing by person. Like there was never any  
25 aggressive really towards me or never any like

11:56:50